

Alaska Telephone Association

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BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Wireline Competition Bureau Reminds Parties of Filing Deadlines for Filing Oppositions and Replies Regarding the Adak Eagle Enterprises, LLC and Windy City Cellular, LLC Petition for Reconsideration and Application for Review of the *Adak/Windy City Waiver Order*, Public Notice in WC Docket No. 10-90, *Connect America Fund*, and WT Docket No. 10-208, *Petitions for Waiver of Certain High-Cost Universal Service Rules*, DA 13-1766 (rel. August 15, 2013)

Dear Ms. Dortch:

The Alaska Telephone Association files these reply comments to the Public Notice DA 13-1766 with respect to an application for review of the Bureaus' denial of AEE and WCC petitions for reconsideration of the \$250 per line cap. We urge the Commission to resolve this application for review and petition for reconsideration promptly.

The Commission delegated authority to the Wireline and Wireless Bureaus to address waivers in the first instance. However, given the significance of the issues here – and the potential consequences to AEE and WCC – the Bureaus' conclusions should be promptly reviewed by the full Commission. In the event that the Commission were to conclude that the Bureaus had erred, reaching that decision in two or three years could be too late to be meaningful. This is especially true here, as the Bureaus substantially denied the requests for waivers.

This need for prompt error correction exists in other contexts with respect to the Transformation Order. For example, it was approximately a year from the time the staff first acknowledged an error with respect to the tribal percentages in the QRA until the error was remedied. Even then, however, the change was only prospective so the error had an impact on support. Errors need to be corrected quickly.

Respectfully,

A handwritten signature in black ink, appearing to read "Jim Rowe", with a long horizontal flourish extending to the right.

James Rowe